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**Patron** HRH The Prince of Wales

To whom it may concern,

**Response to the consultation on the Outline Transport Strategy,**

The Royal Town Planning Institute (RTPI) welcomes the opportunity to provide evidence to England's Economic Heartland's consultation on the Outline Transport Strategy. This response has been developed with input from members in the South-East and East of England.

The RTPI has over 25,000 members who work in the public, private, voluntary and education sectors. It is a charity whose purpose is to develop the art and science of town planning for the benefit of the public. The RTPI develops and shapes policy affecting the built environment, works to raise professional standards and supports members through continuous education, practice advice, training and development.

Please see our submission to the consultation below.

Kind Regards,

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## Introduction

1. RTPI welcomes the Outline Transport Strategy (OTS) from England's Economic Heartland (EEH). This plan forms a basis for the start of strategic transport planning in the South East and East of England, which complements the current monocentric transport network in the region, largely focussed around London.
2. We believe success of this body will come from further collaboration not only in the delivery of large scale infrastructure projects but also in the areas of spatial planning of future developments and communities in order to fully realise the strategy's goal of development producing a 'net gain' for our environment while improving connectivity for all communities.
3. We welcome the Strategy's focus on improving connectivity within the region and the creation of a Strategic Transport Forum to align the interests of the region's local transport authorities (LTAs) alongside regional local enterprise partnerships (LEPs) in order to lead on Transportation issues in the Economic Heartland in collaboration with other bodies.
4. This strategy does well in outlining the issues facing the heartland in terms of the lack of transport infrastructure. It also clearly understands the spatial relationship between Transport Infrastructure and connectivity and makes the case for investment in these transport networks in order to unlock growth but does little to clearly analyse the infrastructure gaps beyond the lack of east-west connectivity.
5. The OTS sets out a number of priorities for the region and key strategic plans for the future, however, there also seems to be a lack of plans and a clear idea of how such a body would be organised and come to decisions on investment funding, prioritisation and the delivery of such schemes.
6. While encouraging, the OTS lacks detail about many of the partnership proposals and how partnership could potentially be implemented in the field of future infrastructure development. The RTPI also believes strength in any delivery of any large-scale transportation infrastructure projects requires the alignment of spatial and economic planning with the delivery of such developments.
7. The RTPI response to this consultation focuses on the integration between the regional infrastructure bodies, local planning and transport authorities and their local plans.

## The draft vision

8. The vision recognises the importance of connectivity in shaping economic outcomes. It's important that transport strategies and investment decisions help shape sustainable transport patterns and urban forms that produce spaces that are beneficial to those living there, but also benefit wider communities. To take this vision forward, more insight into the plans of the body are needed. In particular, there is a lack of details regarding the governance structure of the body and how the partnership would come to decisions over a number of different areas once delivered powers from government.
9. The strategy should take forward this vision with a portfolio detailing a number of infrastructure projects alongside a timetable setting out how these projects would be delivered. Detailing feasibility studies, the business case, the start and completion dates of these projects, and how these projects would be funded.

## Working alongside planning authorities

10. The key component of the OTS is how improved connectivity sustains economic growth and with this we would welcome the intention to align and integrate the transport system with spatial and economic planning. No government body in the UK currently poses both spatial planning and economic powers and future bodies need to take these proposals forward.
11. As a potential statutory body for transport, the heartland should work to ensure suitable resourcing for planning departments across local authorities in order to integrate spatial and economic planning. Helping create sustainable growth that meets the four key principles [enabling economic growth; accessibility and inclusion; quality of life and environment] of the OTS across the entire region and the communities surrounding it. This could work in a manner similar to Transport for the North's (TFN) Strategic Transport Plan, the first such statutory transport body in the UK. TFN have been highly supportive of ambitious commitments to supporting strategies that integrate transportation across other related sectors.<sup>1</sup>
12. The OTS needs to clearly emphasise how it plans to work with local planning and transport authorities, alongside any potential development corporations to ensure better integration of spatial planning and transportation developments. This could include input into developing strategic local plans and also consider how it facilitates infrastructure cooperation between local and combined authorities. The OTS could also benefit from a greater understanding of the factors behind settlement patterns and how these patterns contribute to sustainable growth. RTPI research from last year looked into this in further depth and analysed how benefits from agglomeration can be negated by unproductive settlement patterns<sup>2</sup>

### **The risk of housing and labour market dispersal resulting from improved connectivity**

13. We believe the OTS would benefit from in-depth consideration of the relationship between transport, land use planning and market forces when it comes to creating sustainable economic growth for communities in the region. The suggestion of on-going work on Policy Scenario modelling is also welcome too. In particular, this modelling should investigate how to best mitigate the impact of congestion induced by new road developments that make up a large part of the vision in this strategy.
14. Expanded road infrastructure can lead to increased levels of traffic on peripheral and expanded roads which could counteract the benefits of new road infrastructure designed to improve connectivity. The strategy's commitment to modelling this should begin by recognising in its strategy the potential that new road capacity investment projects have to increase the levels of congestion on the strategic road network and peripheral roads.
15. There are a number of factors within the planning system and the wider land use system that can incubate the negative externalities of congestion, including:

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<sup>1</sup> RTPI – Ambitions for the North <https://www.rtpi.org.uk/media/3355428/ambitionsforthenorth.pdf>

<sup>2</sup> RTPI – Settlement Patterns, Urban Form & Sustainability

<https://www.rtpi.org.uk/media/2822766/settlementpatternsurbanformsustainability.pdf>

- Local authorities lacking an adopted local plan
- The requirements on local planning authorities to demonstrate a five-year land supply
- Viability being emphasised in local planning policy which can lead developers focussing on lower density developments on Greenfield sites.
- Policy constraints on the location of new developments, including Greenfield land.

16. Furthermore, any increase in car use and the length of car journeys will make the Strategy's commitment to a net zero carbon transportation system more difficult due to the transportation sector's ever increasing share of emissions in the UK, currently accounting for just over a third of total carbon emissions in the UK.<sup>3</sup>

### **Meeting carbon reduction targets**

17. Other transport bodies have also hit stumbling blocks as a result of lacking a true commitment to reducing Carbon targets. While ambitious Carbon targets are welcome, a realistic carbon reduction pathway must also be presented alongside this. Sub national transport bodies are required by national legislation to commit to carbon reductions as set out by the 2008 Local Transport Act that requires bodies to "have regard to the social and environmental impacts in connection with the implementation of the proposals contained in the strategy." Transport for the North were forced to address their lack of one in their strategic transport plan following legal challenges facing them and this OTS should work on modelling before such a situation arises.<sup>4</sup>
18. Given such impetus in national legislation for Sub-national Transport Bodies to assess and plan for Carbon reductions, the final transport strategy should clearly analyse its Carbon Budget and present a carbon pathway focussing on the net zero by 2050 goal.

### **Dynamic Assessment of infrastructure**

19. When understanding where is best to build new infrastructure, the consultation should demonstrate dynamic assessment of infrastructure projects, with the ability to showcase the transformative effects of new infrastructure. A dynamic methodology should account for the ability of new infrastructure investment to create new markets and areas for development with new usage patterns that demonstrate the agglomeration benefits of increased connectivity that make up the key of the OTS.
20. Current methodology aimed at assessing benefits of infrastructure development follows linear patterns that assess transportation needs based on current patterns and levels of use which in turn supports further development in areas where there is already growth, rather than looking at infrastructure projects that can create transformative change in

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<sup>3</sup> UK 2018 Greenhouse Gas Emissions  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/790626/2018-provisional-emissions-statistics-report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/790626/2018-provisional-emissions-statistics-report.pdf)

<sup>4</sup> See: Local Transport Today, 15th February 2019 - If climate change targets can be enforced in the North, then why not everywhere?

underutilised modes and areas. The RTPI's response to consultations by the National Infrastructure Commission explain this in more detail.<sup>5</sup>

### **The weight given to changes in travel demand arising from the delivery of transformational infrastructure**

21. The potential partnership between councils should focus on understanding the role the planning system plays in car dependent developments and should take steps to address this by focussing on giving help to Local Authorities to shift modal travel share with the delivery of transformative infrastructure.
22. It should be noted that the planning system has only a limited influence on travel demand as only 10% of the locational choices made by businesses and households are met by new development. The other 90% is represented by turnover within the existing stock of buildings (churn). For this component, transport provision is the main driver of travel demand. This means that to facilitate changing travel demands, better integration is needed between spatial planning and transport provision.
23. This applies at both a local level and the regional level underlined in the OTS. There are also a number of strategies the body could take in order to assist planning authorities at a local level in a number of locations to support strategic planning.
  - Mapping Public Transport Accessibility Levels (PTALs) and public transport capacity across key public transport hubs in the region to assist Local Planning Authorities in designing new developments at densities that support public transport and locating developments in areas that facilitate sustainable means of transport. This process will also help the body to prioritise locations for investment.
  - Modelling the location of strategic sites and relevant planning permissions for housing in regard to key employment clusters and transport infrastructure. RTPI Research from last year has looked at the relationship between settlement patterns and economic productivity, with a defined link existing between high density developments with access to transportation links and productive settlements.<sup>6</sup>
  - Helping local authorities to set targets in changing modal shifts in Transport
  - Working with local authorities to integrate strategic safe cycling networks
24. We also believe that to ensure changing demand for transport can be facilitated, there must be an enhanced focus on policy aiming to reduce car use in Urban Spaces across the region. There are positive indications in the strategy regarding improved facilities for those wishing to shift to more active modes of transportation such as walking and cycling but there is a lack of information about reducing demand for car use through subtle policy changes in towns and cities. The vision in the OTS for the High Street is welcome but this

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<sup>5</sup> RTPI – National Infrastructure Assessment <https://www.rtpi.org.uk/media/1906829/RTPI%20Evidence%20-%20National%20Infrastructure%20Assessment.pdf>

<sup>6</sup> RTPI – Settlement Patterns, Urban Form & Sustainability <https://www.rtpi.org.uk/media/2822766/settlementpatternsurbanformsustainability.pdf>

vision needs policy elements to drive down car usage, similar to those in Transport Strategies by other bodies such as the Greater London Assembly's Transport Strategy.<sup>7</sup>

25. Policies that can be implemented to bring down car use in urban centres include:

- Reducing the number of parking spaces available in town and city centres and removing free parking spaces.
- Removing cars entirely from local roads and side streets to keep traffic on strategic routes only.
- Investing in protected cycling infrastructure such as contraflow systems for cyclists on all one way streets and providing a large number of high quality and secure cycle parking spaces.

26. These strategies exist in a number of cities in the UK and Europe and parts of such strategies have already been seen in towns across the region but are seldom seen as part of an overall strategy to bring down car use across the urban area. These strategies can make up part of the overall system of reducing carbon emissions and also focus on the strategy of sustainable place making in the urban realm.

### **Potential Land Development Issues**

27. The OTS should also acknowledge the potential risk of speculative development and land purchasing along the routes of any future Transport Infrastructure plans. The body should address this by working with local authorities and central government to ensure that mechanisms are in place that allow the compulsory purchase of land at existing values and the ability to capture any increase in land value following investment in infrastructure. Without this, there's a risk that improved connectivity contributes to rising land values in the local area and fails to lead to any benefitted agglomeration benefits in the region.

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<sup>7</sup> The Mayor of London's Transport Strategy 2018 <https://www.london.gov.uk/sites/default/files/mayors-transport-strategy-2018.pdf>